



PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 112
TRENTON, NJ 08625-0112

GURBIR S. GREWAL
Attorney General

MICHELLE L. MILLER
Director

January 29, 2020

via CM/ECF only:

Hon. Edward S. Kiel, U.S.M.J.
Frank Lautenberg Post Office
& U.S. Courthouse
2 Federal Square, Room 347
Newark, NJ 07102

Re: Baskerville v. Jackson, et al.
Docket No. 2:15-cv-06463

Dear Your Honor:

Please accept this joint letter from the parties addressing the status of the above-captioned case pursuant to the Court's order of January 27, 2020. (ECF No. 104).

Discovery Status

Discovery in this case is essentially complete. The parties exchanged written discovery in 2019. Defendants took Plaintiff's deposition on September 5, 2019. There are presently no discovery disputes the parties wish to present to the Court.

Consent Protective Order

Defendant Jackson respectfully asks the Court to enter a consent protective for a document identified only after the discovery end date in this case expired. Specifically, Defendant Jackson subpoenaed the DOC for policies pertaining to emergency response procedures relevant to this case. The DOC located responsive documents, however, they are confidential. Therefore, a consent protective order is requested so the documents may be marked confidential and provided to other counsel for review.



January 29, 2020

Page 2

Next Steps

The parties have previously discussed settlement. Based on those discussions, the Defendants intend to file motions for summary judgment in this matter.

We thank the Court for its ongoing attention to this matter.

Respectfully,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
By: s/ Michael Vomacka
Deputy Attorney General
Counsel for Defendant Jackson

s/Candice Rienzo
Candice Rienzo, Esq.
Counsel for Defendants Cicala, Regis,
Kesselman, and Rutgers University
Correctional Health Care

s/
Walter P. Laufenberg
Counsel for Plaintiff Baskerville

Encls:

- Proposed Consent Protective Order
- Certification in Support of Consent Protective Order
Pursuant to Fed. R. Civ. P. 26(c)(1) and L. Civ. R. 5.3